



**Association of California Water Agencies**  
Leadership Advocacy Information Since 1910

April 22, 2008

HAND DELIVERED

Daniel W. Hancock, Chairman  
And Commissioners  
Little Hoover Commission  
925 L Street, Suite 805  
Sacramento, CA 95814

Subject: Study of State Water Resources Control Board and the Regional Water Quality Control Boards

Dear Chairman Hancock:

The Association of California Water Agencies (ACWA) appreciates this opportunity to provide comments to help inform the Little Hoover Commission's study of State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards. ACWA consists of 450 public water agencies. Our members serve over 90% of the delivered water in California for domestic, agricultural and industrial uses. California's water agencies manage water resources under the water rights system administered by the SWRCB. Water agencies are also regulated by the SWRCB and the regional boards with regard to water quality of surface water, ground water, treated wastewater and recycled water, and stormwater discharges.

We appreciate the attention that the Little Hoover Commission is giving to SWRCB and regional boards, and the challenges they face in appropriately responding to the state's pressing water quality needs. As you know, California is facing some of the most significant water challenges it has faced in decades. Changing climate patterns, population growth, and court decisions, among other factors, continue to impact the reliability, availability and quality of water supplies. The SWRCB and regional boards have a crucial role in orchestrating an effective response to these challenges.

ACWA and its members have for many years worked within the on-going regulatory process to help highlight what we believe should be the key strategic priorities of the SWRCB and how to achieve a balance between the need for consistent statewide policy with the need for flexibility to handle regional issues. Additionally, ACWA has provided input to the SWRCB on its recent effort to comprehensively revise its Strategic Plan. We support this effort and believe that a bold and visionary statement

of policy is essential to guide and prioritize the many water rights and water quality initiatives of the SWRCB and the regional boards.

ACWA has provided detailed comments to the SWRCB on its Strategic Plan, and we believe that these comments are valuable in the context of the Little Hoover Commission's review (previously provided to your staff). In summary, ACWA:

- supports a fundamental shift in culture toward “outcomes rather than outputs” - from the focus on issuing water quality permits, enforcement and violations to measurable objectives, demonstrating true water quality improvements, and accountability for results,
- encourages a focus on collaborative, watershed-based programs and projects – which may be less burdensome, less expensive and less time-consuming than traditional regulation,
- encourages a clearly-defined long-term water policy vision for how California's environmental and economic water needs will be met in the context of water supply problems, rapidly increasing population, and climate change,
- supports increased consistency amongst regional boards in policy interpretation and enforcement, while maintaining appropriate flexibility for region-specific situations,
- supports better use and transparency of appropriate science in regulatory and permitting decisions,
- supports a fundamental reform of the water rights administrative process.

ACWA recognizes that water policy is extremely complex and that the role of the SWRCB demands a high-level, balanced, pro-active, and collaborative approach to protecting and managing California's water resources. In many areas, the Boards have done a good job in executing their charge; however, as mentioned above, there is much room for improvement as well.

We appreciate your the attention to this matter, and support the formation of a stakeholder group to advise the Little Hoover Commission's on-going study. ACWA would like to participate in this stakeholder group.

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Again, we commend the Little Hoover Commission on this effort. We recognize that our comments may warrant more details and discussion, which we are happy to provide. If you have any questions, please feel free to contact me at [kristac@acwa.com](mailto:kristac@acwa.com) or 916-441-4545.

Sincerely,

A handwritten signature in cursive script, appearing to read "Krista Clark".

Krista Clark  
Director of Regulatory Affairs